

1 Michael C. Murphy, Esq. (S.B. No. 104872)

Michael@murphlaw.net

2 Michael C. Murphy, Jr. Esq. (S.B. No. 305896)

Michael.jr@murphlaw.net

3 LAW OFFICES OF MICHAEL C. MURPHY

4 2625 Townsgate Road, Suite 330

5 Westlake Village, CA 91361

6 Tel.: 818-558-3718

7 Fax: 805-367-4506

8 Attorneys for Defendant,

9 Patrick Byrne

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

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12 ROBERT HUNTER BIDEN, an
13 individual,

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15 Plaintiff,

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17 vs.

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19 PATRICK M. BYRNE, an individual,

20 Defendant.
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} Case No.: 2:23-cv-09430-SVW-PD
} Judge: Honorable Stephen V. Wilson
} Courtroom: "10A"

} Complaint Filed: November 8, 2023

} **DEFENDANT PATRICK M. BYRNE'S**
} **JURY VOIR DIRE QUESTIONS AS**
} **REQUESTED BY THE COURT**

} **Date:** July 28, 2025
} **Time:** 1:30 p.m.
} **Loc:** Hon. Stephen V. Wilson
} **Ctrm:** "10A"

1 **PLEASE TAKE NOTICE** that Defendant Patrick Byrne, hereby submits
2 to the court his Requested Jury Voir Dire Questions as requested by the court, a
3 copy of which is attached hereto, designated Exhibit "A" and incorporated by
4 reference herein.

5 Dated: July 24, 2025

LAW OFFICES OF MICHAEL C. MURPHY

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7 By: /s/ Michael C. Murphy, Esq.

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9 Michael C. Murphy, Esq.
10 Michael C. Murphy, Jr., Esq.
11 Attorneys for Defendant,
12 Patrick Byrne
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Exhibit “A”

JURY VOIR DIRE QUESTIONS

NAME (Please print): _____

Juror # _____

1. Gender: ☐ Male ☐ Female
2. Age: _____
3. Place of birth? _____
4. In what city/state did you grow up?

5. a. City/neighborhood where you live: _____
For how long? _____
b. What other areas or communities have you lived in?

c. How long have you lived in the Los Angeles Area? _____ How long in California?

d. Do you ☐ Rent ☐ Own ☐ Live w/ others and do not pay rent
6. Is English your first language? ☐ Yes ☐ No
If not, what is your primary or first language?

7. a. What is the last level of education you completed?

<input type="checkbox"/> Grade school or less	<input type="checkbox"/> Some college (no degree)
<input type="checkbox"/> Some high school	<input type="checkbox"/> 2-year Associate of Arts degree
<input type="checkbox"/> High school graduate	<input type="checkbox"/> 4-year College graduate (Major: _____)
<input type="checkbox"/> Technical/Business School	<input type="checkbox"/> Post graduate study (Major/degree: _____)

b. What schools did you attend?

c. Please list any certificates, licenses or degrees you have obtained:

8. What is your employment status?

<input type="checkbox"/> Employed full time	<input type="checkbox"/> Homemaker	<input type="checkbox"/> Retired for _____ year(s)
<input type="checkbox"/> Employed part-time	<input type="checkbox"/> Unemployed	<input type="checkbox"/> Full-time Student <input type="checkbox"/> Other: _____

11. What social, civic, charitable, trade or other organizations are you associated with?

12. Have you ever supported or actively participated, in any political groups (such as Black Lives Matter, etc.) or any other political/grassroots organizations and/or campaigns?
☐ Yes ☐ No If yes, please state which ones: _____

13. What political groups do you identify with and emotionally support?

14. What political parties do you identify with and emotionally support?

15. Do you own a computer or other device that allows you to use the internet, receive and send email, or interact with others online? ☐ Yes ☐ No

If Yes, which of the following devices do you own or have access to? (Check all that apply)

☐ Desktop computer ☐ Laptop computer

☐ Tablet (such as iPad) ☐ Smartphone

16. On which of the following services do you have an account or use (check all that apply):
☐ email

☐ Facebook ☐ LinkedIn ☐ Instagram ☐ Snapchat ☐ Twitter ☐ Text or Instant Messenger

17. Do you belong to any groups within Facebook/LinkedIn or participate in any chat/blog groups?

☐ Yes ☐ No

18. Do you host or regularly participate in a blog site? ☐ Yes ☐ No

19. Have you, your spouse or partner, or your children ever served in the military?

☐ Yes, self ☐ Yes, spouse/partner ☐ Yes, child/stepchild ☐ No

20. Have you or a family member ever been a member of a union?

☐ Yes, self ☐ Yes, family member ☐ No If yes, which union(s)?

☐ Yes, self ☐ Yes, spouse/partner ☐ Yes, family member ☐ No

21. Have you ever served on a jury before? ☐ Yes ☐ No

22. When did that trial take place?

23. What was the ultimate verdict that the jury reached?

24. Was there anything about your prior jury service that will prevent you from being an impartial juror in this case? ☐ Yes ☐ No If Yes, please explain:

25. Do you or anyone close to you have any legal training, including work as a lawyer, judge, paralegal, or in the court system? ☐ Yes ☐ No If Yes, please explain

26. Have you or anyone close to you ever been sued by anyone, even in small claims court

☐ Yes ☐ No If yes, please explain, including who, the nature of claim, and outcome:

Were you/they satisfied with the result? ☐ Yes ☐ No Please explain:

27. Have you or anyone close to you ever sued anyone, even in small claims court? ☐
Yes ☐ No If yes, please explain, including who, the nature of claim, and outcome:

28. Were you satisfied with the result? ☐ Yes ☐ No If yes, please explain:

29. Have you or anyone close to you ever been a witness, given a deposition and/or testified in any proceeding? ☐ Yes ☐ No If yes, please explain:

30. Would any experiences you have with or knowledge about the court system as a juror, plaintiff, defendant, witness, or interested party affect your attitudes about being a juror in this case?

☐ Yes ☐ No If Yes, please explain:

31. Do you support caps or limits on the amount of money juries can award in civil cases?

☐ Yes ☐ No If Yes, please explain:

32. Do you have any ethical, religious, political, or other beliefs or opinions that would affect your ability to be a juror in this case?

☐ Yes ☐ No If yes, please explain:

33. Have you heard any media coverage about Robert Hunter Biden who is a public political figure involved in this case? If so, what was the nature of the coverage.

34. Have you heard any media coverage about Patrick Byrne who is a public political figure involved in this case? If so, what was the nature of the coverage.

35. Do you believe that the media coverage of public political figures is always accurate? Why or why not?

36. Can you set aside any opinions formed from media exposure of either party in this case and decide this case solely based on the evidence presented in court?

37. Do you have any strong opinions about Robert Hunter Biden who is involved in this case? If so, what are those opinions?

38. Do you have any strong opinions about Patrick Byrne who is involved in this case? If so, what are those opinions?

39. Are you comfortable serving as a juror in a case involving high profile public political figures?

40. Do you believe that public political figures should be held to a different standard of accountability than private individuals? If so, how might that belief affect your judgment in this case?

41. Do you have any opinions about the role of public political figures in society?

42. If you are instructed to apply a legal principal of law to decide this case that conflicts with your personal beliefs, would you be able to follow the court's instructions?

43. Are you willing to follow the court's instructions and decide the case based solely on the evidence presented in court?

44. Are there any reasons that you might not be able to be completely fair and impartial in this case?

45. Is there any other information that you would like the Court to know about your ability to serve as an impartial juror in this case?

☐ Yes ☐ No If yes, please explain:

46. How many of you have served on a jury before? What are your thoughts or feelings about that experience?

47. Do you follow national politics or political news closely?

48. How many of you follow the news regularly? What outlets do you read/follow?

49. What are your thoughts or feelings about how news media portray public figures?

50. Do you use social media platforms (like Twitter/X, Telegraph, Facebook, Truth Social, BlueSky, etc.)?

51. What type of content do you engage with on these platforms?

52. Have you ever heard of either Robert Hunter Biden or Patrick Byrne before today?

53. If yes, what are your thoughts or feelings of either person?

54. Are you familiar with any controversies involving Hunter Biden and/or Patrick Byrne?

55. If yes, how did you form your opinions about those events? How long have you had this

opinion, how likely are you to change your mind?

56. Do you have any thoughts or feelings about the Biden family or the broader political establishment?

57. How many of you have strong feelings about justice in relation to public figures? What thoughts or feelings do you have on what justice means?

58. How many of you have concerns about how the legal system treats cases involving public figures? What are your thoughts or feelings about that?

59. Do you believe that public figures should be treated differently under the law when it comes to reputation or public commentary?

60. How many of you believe that public figures should be held to a higher standard of accountability? What are your thoughts or feelings on that issue?

61. How many of you think fairness is essential in a trial involving public figures? What are your thoughts or feelings on what fairness looks like?

62. What are your thoughts or feelings about the subject of public criticism or defamation online or in the media?

63. How many of you have personal experiences that might relate to the issues in this case? What do those experiences evoke, if anything?

64. How many of you think that social media impacts public opinion about legal cases? What are your thoughts or feelings about that influence?

65. What are your thoughts or feelings on holding someone legally responsible for things they say about others in public forums?

66. Do you believe individuals should have the right to express controversial or unpopular opinions online, even if others may disagree or be offended?

67. What are your thoughts or feelings about the constitutional right to free speech?

68. What are your thoughts or feelings about whistleblowers, anti-corruption advocates, or people who challenge authority or institutions?

69. Without hearing any evidence, this case involves allegations surrounding statements made a public figure. Do you believe you can fairly evaluate the evidence without regard to your political beliefs or opinions about the people involved?

70. How many of you feel that your political beliefs might influence your views on this case? Can you share your thoughts or feelings?

71. How many of you believe that your personal values influence your judgment in legal matters? What are your thoughts or feelings on that?

72. Is there anything about this case, based on what you've heard so far, that would make it difficult for you to be completely fair and impartial? Why and why not?

73. The judge will instruct you that: If the evidence shows that "the statements" in question were true, or reasonably believed to be true, would you have any hesitation in following the law? Why or why not?

74. Do you have any moral, religious or ethical obligations that prevent you from sitting in judgment of others?